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**Via CEF**

United States Magistrate Judge Stacey D. Adams  
Frank R. Lautenberg U.S. Post Office & Courthouse Building  
2 Federal Square  
Newark, NJ 07102

***Re: C.V. v. Lauren Carminucci  
United States District Court, District of New Jersey  
Case No.: 2:24-cv-2096***

Dear Magistrate Adams,

I represent the plaintiff, C.V., in the above captioned matter. I write to respectfully request a modification to the Amended Scheduling Order (DE 24) to extend the deadline for plaintiff to take Defendant's deposition.

Since the middle of November, the parties have been attempting to find a mutually agreed upon date for Ms. Carminucci's deposition. For ease of timing and access, plaintiff consented to a virtual deposition. However, defendant's counsel has two time-certain trials in January and will not be available until the first week of February.

Accordingly, we request that the Amended Scheduling Order be modified to permit plaintiff to take defendant's deposition on or before February 14, 2025. This extension will allow ample time for scheduling while accommodating defendant's counsel's trial schedule.

We appreciate the Court's consideration of this request.

Respectfully submitted,

*Daniel S. Szalkiewicz, Esq.*

By: Daniel S. Szalkiewicz, Esq.